

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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CLINTON ROBINSON,

Plaintiff,

v.

COOK COUNTY,

a Municipal Corporation,

THOMAS J. DART, Sherriff of Cook County

JOHN DOE CORRECTIONAL OFFICERS,

KENT D. HOOK,

Cook County Social Worker

**JURY DEMANDED**

**COMPLAINT**

Now comes the Plaintiff, CLINTON ROBINSON, by and through his attorneys, DVORAK LAW OFFICES, LLC, and complains against Defendants COOK COUNTY, THOMAS J. DART, JOHN DOE CORRECTIONAL OFFICERS, and KENT D. HOOK, stating the following:

**Jurisdiction and Venue:**

1. The incident occurred on or about November 15, 2018 to December 17, 2018 in Cook County, Illinois.
2. The jurisdiction of this court is invoked pursuant to the Civil Rights Act, U.S.C. 42 U.S.C. § 1983, § 1988 and 28 U.S.C. § 1331 and § 1343(a); the Constitution of the United States pendant jurisdiction as provided under 28 U.S.C. § 1367(a).

3. Venue is proper under 28 U.S.C. § 1391(b)(2) as all parties resided in this judicial district and all underlying events pertaining to the claims occurred within this District.

**Parties:**

4. Plaintiff Clinton Robinson is a resident of the City of Chicago, located in Cook County, Illinois.
5. Defendant Cook County is a municipal corporation located in Cook County, Illinois, and is the indemnifying agent for Defendant Dart and his employees.
6. Defendant Dart was the Cook County Sheriff at the time of this Complaint.
7. Defendants John Doe Correctional Officers and Kent D. Hook were employed by the Cook County Sheriff at all relevant times addressed in the complaint.
8. These Defendants were acting under color of law, and within the scope of their employment with Defendant Dart at all times during the incident.

**Facts:**

9. The Plaintiff was arrested and arraigned on March 4, 2017 for two counts of theft over \$500 (Case No. 17CR03526).
10. He plead guilty on August 31, 2017 to one count, the other count was dismissed *nolle prosequi*. The Plaintiff was then sentenced to a term of probation.

11. On October 3, 2019 the Defendant was placed in custody for violating the terms of his probation and possession with intent to deliver a controlled substance (Case No. 18MC119798).
12. The court dismissed the Plaintiff's possession charges *nolle prosequi* on November 15, 2019 (case number 18MC119798).
13. The court in that case ordered that the Plaintiff be held in custody until the court ruled on his violation of probation for case number 17CR03526.
14. On November 21, 2018, the 17CR03526 Court found that because the pending case was dismissed the Plaintiff was to be released and continue his term of probation until August of 2019.
15. The Plaintiff had no other pending criminal charges after November 21, 2018.
16. The Plaintiff alerted his social worker Defendant Kent Hook that he was required to be immediately released from custody, but Defendant Hook ignored these requests and never took action to correct the Plaintiff's illegal detention.
17. The Plaintiff also made repeated requests to Defendant John Doe Correctional Officers at the Cook County Jail that he was being held illegally and without justification, but the Defendants ignored these requests and never took any action to correct the Plaintiff's illegal detention.
18. Although the Plaintiff had no pending charges against him as of November 21, 2018, he was kept in Cook County custody until December 17, 2018, 26 days after his court mandated released.

19. As a result of the Defendants' actions, the Plaintiff experienced injuries, including but not limited to, loss of liberty and emotional, physical and pecuniary damages.

Count I – Unlawful Seizure, 42 U.S.C. 1983

(Plaintiff Against Defendant John Doe Correctional Officers and Defendant Kent D. Hook)

20. Plaintiff re-alleges the aforementioned paragraphs, and incorporates them herein as if stated in full.

21. In taking the actions described above, Cook County, Defendant John Doe Correctional Officers and Defendant Kent D. Hook, acting within the course and scope of their employment with the Cook County Sheriff, caused the Plaintiff to be unreasonable seized and held against his will and restrained of his freedom and liberty, and thus were a direct and proximate cause of the Plaintiff's injuries, including a loss of liberty, and emotional distress.

Count II – State Law Claim of False Imprisonment

(Plaintiff Against Defendant Sherriff Thomas H. Dart)

22. Plaintiff re-alleges the aforementioned paragraphs, and incorporates them herein as if stated in full.

23. In taking the actions described above, Defendant Dart, through one or more of his employees, acting within the course and scope of their employment, caused the Plaintiff to be unreasonable seized and held against his will and restrained of his freedom and liberty, and thus these actions were the proximate cause of the Plaintiff's injuries, including a loss of liberty, and

emotional distress.

24. As a result of the described infringement on Plaintiff's rights, the Plaintiff suffered damages including, but not limited to, those described above.

WHEREFORE, the Plaintiff demands compensatory damages against Defendant Dart, plus the costs of this action, and additional relief as this Court deems equitable and just.

**COUNT IV  
STATE LAW CLAIM  
INDEMNIFICATION  
PLAINTIFF V. COOK COUNTY**

25. Each paragraph of this Complaint is fully restated herein.

26. In Illinois, public entities are directed to pay any tort judgment for compensatory damages for which employees are liable within the scope of their employment activities.

27. Defendant Cook County is the indemnifying entity for the actions of the Cook County Sheriff and any individual Defendants described herein who took their actions while under color of law and in the course and scope of their employment with Defendant Dart.

28. Thus, the Plaintiff seeks indemnification from Cook County for any judgment obtained against Defendant Dart and his employees.

**Request for Relief**

The Plaintiff respectfully requests that the Court enter judgment in his favor and against the Defendants, award compensatory damages and attorneys' fees and

costs against all Defendants, award punitive damages against the Defendant Officers, and grant any other equitable relief this Court deems just and appropriate.

**PLAINTIFF DEMANDS A TRIAL BY JURY**

Respectfully submitted,

/s/ Richard Dvorak  
Richard Dvorak, One of the  
Attorneys for the Plaintiff.

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